



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Jeffrey M. Movit
A Professional Corporation
(917) 546-7708 Phone
(917) 546-7678 Fax
jmm@msk.com

February 22, 2022

VIA ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Full Circle United, LLC v. Bay Tek Entm't, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan:

We are counsel for Bay Tek in the above-referenced case. Pursuant to the Special Master's Order No. 9 attached hereto, the parties were directed to "write a joint letter to Judge Cogan, informing him that depositions are to take place in March and asking him for guidance as to whether the complaint will be amended to encompass further claims."

Accordingly, given that depositions are going forward in March, we respectfully seek the Court's guidance as to whether or not the complaint will be amended to encompass further claims, pursuant to Full Circle's pending motion for leave to amend (ECF No. 85).

Notwithstanding the Special Master's order, Full Circle will not agree to join in this letter unless the letter includes additional argumentation from Full Circle. Accordingly, this letter is submitted only on behalf of Bay Tek.

* * *

We appreciate the Court's consideration of this matter.

Respectfully,

/s/ Jeffrey M. Movit

Jeffrey M. Movit
A Professional Corporation for
MITCHELL SILBERBERG & KNUPP LLP